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February 11, 2010

JOINT REQUEST FOR MOTION ADJOURNMENT

Katharine S. Hayden, U.S.D.J.
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101-0999

Re: Robert Kahn, et al. vs. Palisades Collection, LLC
Case 2:08-cv-05195-KSH-PS

Dear Judge Hayden,

My office represents the Plaintiffs. This letter is a joint request by all counsel to adjourn the pending motions [Doc. 32 and 33] so that they will be returnable on April 5, 2010 (opposition to be filed by March 22 and replies by March 29). The motions were initially returnable on February 16, 2010 and, on the parties' joint request [Doc. 34], they were adjourned to March 1, 2010 [Doc. 35].

The present request is based on the parties having commenced meaningful settlement discussions last week (when counsel for the parties here held depositions in another matter involving Palisades but a different plaintiff). Unfortunately, this week has been uneventful due to the weather. In email communications with Mr. Greystone, his office has been closed due to the state of emergency in Philadelphia. If there is no adjournment, our motion responses would be due this Tuesday (and Monday is a holiday). While a one cycle adjournment may very well be sufficient, we are jointly requesting a two cycle adjournment so as to avoid the need to make a further request.

Thank you for your consideration in this matter.

Respectfully,
s/Philip D. Stern
Philip D. Stern
via ECF

cc: All defense counsel, via ECF

page 1
pds1361

* Request GRANTED. No Further adjournment
will be permitted.

SO ORDERED

KS Hayden
Katharine S. Hayden, USDS

2/16/10